

THE STATE



OF ARIZONA

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## GAME & FISH DEPARTMENT

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MAY 27 1993

May 25, 1993

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Ms. Donna Searcy  
Secretary  
Federal Communications Commission  
1919 M Street NW, Room 222  
Washington, DC 20554

MAY 27 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: PR Docket No. 92-235 - Spectrum Refarming

Dear Ms. Searcy:

The Arizona Game and Fish Department (G&F) wishes to provide brief comments to the Commission's plan for "Replacement of Part 90 by Part 88 to Revise the Private Land Mobile Radio Services and Modify Policies Governing Them". (PR Docket 92-235) The Arizona G&F Department operates approximately 30 VHF base/mobile relay stations around the State, interlinked by microwave to communicate with approximately 400 mobile and 200 portable radios. This system operates in the Forestry/Conservation subpart of the Public Safety radio service.

This system provides essential communications to our personnel scattered statewide, many of whom are sworn, law enforcement officers. This system is essential to their own personal safety and welfare, as well as protecting the public's interests in wildlife conservation.

First, in general, the Arizona Game and Fish Department supports the comments of Arizona APCO, Inc. We also specifically support the comments of the Arizona Department of Public Safety (ADPS), which supports our radio communications system.

We are especially concerned that the FCC's proposed rewrite would not only impose an extreme cost hardship on this agency, but would also destroy the integrity of our radio system. We have recently spent \$2,500,000 on radio equipment which would be obsolete by January 1, 1996, should the Commission's existing plan be implemented. Also, should additional sites need to be constructed to replace lost coverage because of new rules, costs would run into many millions of dollars. Our specific concerns are:

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